

**UNITED STATES OF AMERICA** : **CASE NO. 3:19-cr-169**  
 Plaintiff :  
 vs. : **Judge Thomas M. Rose**  
**ETHAN KOLLIE** :  
 Defendant :

Now comes Defendant Ethan Kollie, by and through undersigned counsel pursuant to 18 U.S.C. §3145(b), and hereby moves this Honorable Court to for an ORDER amending the ORDER SETTING CONDITIONS OF RELEASE issued December 23, 2019 (Doc.#46).

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/s/Antony A. Abboud  
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**MEMORANDUM**

Mr. Kollie has been sentenced by this Court and received an official notice from the Bureau of Prisons to report to a specific BOP Facility April 28, 2020. However, because of the current COVID-19 health crisis, his report date has been delayed until June 11, 2020.

Mr. Kollie is ready to begin serving his sentence and requests that that Court reconsider its “voluntary surrender” order by revoking the same and allowing Mr. Kollie to begin serving his sentence in the county jail until the BOP is ready to accept him into a facility.

This request has been communicated to the Government, and it DOES OBJECT to the request.

Respectfully submitted,

s/Nicholas G. Gounaris  
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**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing was sent to all parties via the clerk of court's electronic filing system.

**GOUNARIS ABBOUD  
INC., LPA**

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